Case: 1:18-cr-00513-CAB Doc #: 99 Filed: 04/24/19 1 of 2. PageID #: 418

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA, : Case No. 1:18-CR-00513-CAB-1

Plaintiff, : JUDGE CHRISTOPHER A. BOYKO

.

vs. : <u>DEFENDANT'S MOTION TO</u>

**CONTINUE TRIAL AND FINAL** 

AARON EISENBERG, : <u>PRETRIAL DATES</u>

Defendant. :

Now comes the Defendant, **AARON EISENBERG**, by and through his undersigned counsel, and respectfully moves this Honorable Court to enter an Order continuing the May 7, 2019 final pretrial and May 13, 2019 trial dates, on the grounds that defense counsel and the government are in discussions for a plea resolution in this matter, but need additional time to finalize the actual plea agreement for the Defendant.

Upon information and belief, the government is also in plea negotiations with codefendants.

The government has authorized defense counsel to inform the Court that the government will not oppose this Motion.

WHEREFORE, for all of the aforestated reasons, the Defendant, AARON

EISENBERG, by and through his undersigned counsel respectfully moves this

Honorable Court to enter an Order continuing the May 7, 2019 final pretrial and May 13,

2019 trial dates, for a period of not less than 30 days, on the grounds that defense

counsel and the government are in discussions for a plea resolution in this matter, but need additional time to finalize the actual plea agreement for the Defendant.

Respectfully submitted,

/8/- ANGELO F. LONARDO, ESQ.

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Counsel for **AARON EISENBERG** 

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 24th day of April, 2019, a copy of the following was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/8/~ ANGELO F. LONARDO, ESQ.

ANGELO F. LONARDO, ESQ.